

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

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ROGER KEITH, Co-Executor
To the Estate of
Ernest V. Keith,

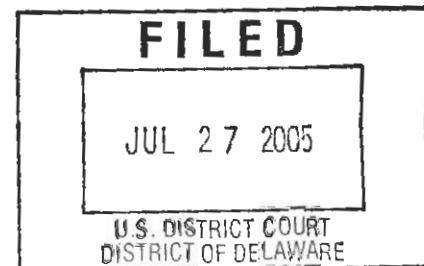
1:05-cv-00326 KAJ

Plaintiff,

Vs.

Gregory A. Sioris, Esquire,
Henry A. Heiman, Esquire,
And Heiman Aber Goldlust & Baker,

Defendants.

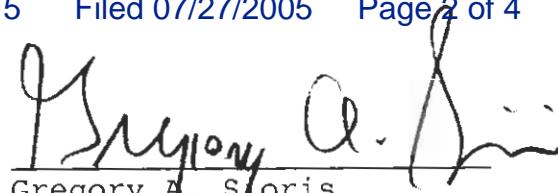


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**REPLY DECLARATION OF GREGORY A. SIORIS IN SUPPORT OF
PETITION FOR REMOVAL**

1. I, Gregory A. Sioris, of 350 Fifth Avenue, Suite 7676, New York, NY 10118-7606 reply to the answer of defendants Henry A. Heiman and Heiman, Aber Goldlust & Baker dated June 16, 2005. This reply is made on my personal knowledge of the facts.
2. The answering defendants do not allege anywhere in their papers that they are indispensable parties to this suit in order to make a strong argument against removal. As a result, this Court can drop the other defendants pursuant to Rule 21 and grant the removal petition as to the undersigned, see LeBlanc v. Cleveland, 248 F.3d 95, 99-100 (2nd Cir. 2001).

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: New York, NY
July 22, 2005



Gregory A. Storis
Defendant *Pro Se*
350 Fifth Avenue, Suite 7606
New York, NY 10118-7606
(212)840-2644

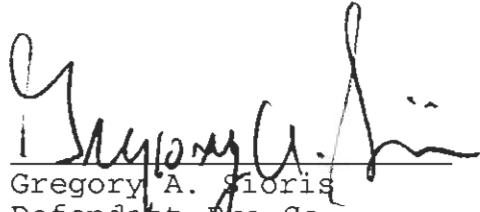
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

-----x
ROGER KEITH, Co- Executor of the :
Estate of Ernest V. Keith, :
: Plaintiff, :
v. :
: :
GREGORY A. SIORIS, ESQUIRE, :
et. al., :
: Defendants. :
-----x

CERTIFICATE OF SERVICE

I, Gregory A. Sioris, on July 25, 2005, forwarded a copy of the undersigned defendant's reply to the following parties in the manner as described above their names.

Dated: New York, NY
July 25, 2005



Gregory A. Sioris
Defendant Pro Se
350 Fifth Avenue, #7606
New York, NY 10118-7606
(212)840-2644

Via First Class Mail

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Via First Class Mail

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Elzufon Austin et. al.
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Heiman, et. al.
300 Delaware Avenue, Suite 1700
Wilmington, DE 19899-1630



**U.S.M.S.
X-RAY**

Gregory A. Sioris
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350 Fifth Avenue
New York, NY 10118-7606

Filing Clerk
United States District Court
844 King Street
Wilmington, DE 19801

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